CAMP's COMMENT RE: MESABA ENERGY PROJECT DEIS November 27, 2007 Prepared by Ed Anderson, Physician and Co-Chair of Citizens Against the Mesaba Project

Mesaba Energy Project, PUC Docket No. E6472/GS-06-668

DOE Draft EIS for the Mesaba Energy Project (DOE/EIS-0382D)

For the past two weeks, CAMP has been reviewing the DEIS, and our overall reaction is disappointment. We're disappointed in the agencies that produced this document, and we're extremely disappointed in the process by which you have led us to believe that public input is important.

The DEIS is far from complete. The purpose of the scoping was supposed to ensure that the EIS is complete and to identify areas of local concern. Instead, it appears that the overall objective of this document is to minimize the adverse environmental impacts, push a federal policy for "clean coal", and facilitate a project that has no hope of ever realizing the DOE objectives outlined in the Clean Coal Power Initiative.

Many people in this room have spent inordinate amounts of time reading the JPA, researching the issues, and submitting comments during the scoping process. Agencies such as the Army Corps of Engineers, MPCA, and the MN DNR also submitted numerous comments over a wide variety of issues. These issues included Excelsior's unverified claims of need for power, site selection, water discharge and mercury deposition, air emissions, and the plant's impact on the CMP trout fishery and local recreation. Most of the comments have not been addressed at all, and others have been addressed inadequately.

For example; the JPA describes how the Canisteo Mine Pit (CMP) would be closed to recreational use and that the water and trout fishery will be ruined by concentrated discharge of cooling water. The DEIS does not acknowledge that the CMP is a trout fishery or even that it is used for recreation

As the CMP becomes polluted, private wells and the municipal water supply for Coleraine and Bovey are at risk. The MDH Wellhead Protection study that describes the hydrologic connection between the municipal wells and CMP is not mentioned in this document.

Numerous comments were submitted regarding human health, and most of these comments came directly from a study commissioned by Excelsior in 2005. In Feb 2007, the NEJM published an excellent study showing that each 10 mcg/m3 increase in PM 2.5 increases the risk of heart attack and stroke by 70%. A large majority of physicians and nurse practitioners in Itasca County have submitted a letter expressing opposition to this project and concern for our patient's health and well-being. Excelsior's study clearly reveals the expected increase in illness and premature death due to Mesaba's air emissions, and those numbers are low given recent research in this field.

In contrast, the DEIS describes Electro-Magnetic Field (EMF) effects and gives a brief summary of cancer and non-cancer health hazard indices. But the majority of this text talks about rates of

obesity, hypertension, smoking, and drinking among people in MN, Itasca County, and St. Louis County. None of the important health issues are discussed in the DEIS. Excelsior actually did a better job of describing the adverse health impacts of their project than you have. In this area again, the DEIS is grossly inadequate.

These are just a few examples, and CAMP's formal comments will be submitted prior to the January 11th deadline.

Although we believe the DOE's objectives related to their Clean Coal Power Initiative are misdirected, they do appear to be clear. The DOC objectives are not quite as clear. The DOC mission statement includes "ensuring equitable commercial and financial transactions, reliable utility services, and advocating the public's interest before the PUC". The Mesaba Project does not meet any of the DOE & DOC objectives by any stretch of the imagination. We certainly don't feel that the DOC is advocating in the public's interest. This is the wrong project, and it's in the wrong place. The people here today deserve to have you take their concerns and comments seriously. We hope you'll show us that you really do value public input, and demonstrate that in the Final EIS.

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